

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

| | | |
|--------------------------------|---|--------------|
| In re. Alyssa Ann Heiland, and | : | Chapter 13 |
| Michael J. Heiland, | : | |
| | : | 20-12186-PMM |
| Debtors. | : | |

MOTION TO MODIFY CHAPTER 13 PLAN POST CONFIRMATION

Debtors, by and through their attorney, hereby move this Honorable Court to permit the modification of their Chapter 13 Plan pose confirmation and in support thereof aver as follows:

1. Debtors filed the above-captioned case on April 30, 2020.
2. Debtors' Second Amended Plan was confirmed on December 10, 2020.
3. Debtors have modified their Plan post confirmation 2 times prior.
4. Debtors have experienced a change in financial circumstances subsequent to the approval of their Fourth Amended Plan.
5. In May, 2023, Debtors' 8-year-old Basset Hound – Dozer – became ill and needed extraordinary veterinary care, including 2 surgeries.
6. The cost of the aforementioned care cost \$7,700.00 in total and the component amounts were due contemporaneously with the care provided.
7. In order to pay for the care needed as it became necessary, Debtors were forced to forego several mortgage and trustee payments.
8. Unfortunately, Dozer did not survive despite the expert care he received.
9. Debtors' counsel has negotiated a stipulation with the mortgage lender wherein Debtors are to pay the post-petition arrears through the Plan.

10. Debtors are unable to make up the \$4,367.00 in missed Plan payments.
11. Debtors are able to resume their current Plan payment of \$730.00 as of April 2024.

WHEREFORE, Debtors respectfully request that this Honorable Court abate \$4,367.00 in Plan payments and allow for the mortgage stipulation to be incorporated into a new Plan.

March 13, 2024

Respectfully submitted,
/s/ David W. Tidd
ID 88203
656 Ebersole Road
Reading, PA 19605
Phone: 610-838-8700
Email: bankruptcy@davidtiddlaw.com